

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

FLAME S.A.,)	
)	
Plaintiff,)	Civil Action No: 2:13-cv-658
)	2:13-cv-704
GLORY WEALTH SHIPPING PTE LTD.)	
)	
Consolidated Plaintiff,)	
)	
NOBLE CHARTERING, INC.,)	
)	
Intervening Plaintiff,)	
v.)	
)	
INDUSTRIAL CARRIERS, INC.)	
VISTA SHIPPING, INC., and)	
FREIGHT BULK PTE. LTD.,)	
)	
Defendants.)	

MOTION TO WITHDRAW AS COUNSEL

Mayer Brown LLP (“Mayer Brown”) hereby respectfully moves to withdraw as counsel for Specially Appearing Defendant Freight Bulk Pte. Ltd. (“FBP”) in the above-captioned matter.¹ In support hereof, Mayer Brown states as follows:

1. After discussions with the client, the client has discharged Mayer Brown as its counsel in the above-referenced matter.

2. Given Plaintiffs’ recent Emergency Motion For Continuance of Trial and Discovery Deadline (ECF No. 236) and the addition of Sergei Kachura as counsel for FBP in this matter, neither Plaintiffs nor FBP will be prejudiced by Mayer Brown’s withdrawal.

¹ The Mayer Brown attorneys that have appeared *pro hac vice* in this matter are Carmine R. Zarlenga, Adam L. Hudes, Reginald R. Goeke, Marcus A. Christian, and Sean P. McDonnell. This motion seeks to withdraw on behalf of all those attorneys.

WHEREFORE, for the foregoing reasons, Mayer Brown respectfully requests that the Court grant its motion to withdraw as counsel in this matter.

Dated: May 22, 2014

Respectfully submitted,

/s/ Reginald R. Goeke²

MAYER BROWN LLP

Reginald R. Goeke (*Pro Hac Vice*)
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² This motion has been filed by FBP's local counsel, Patrick M. Brogan, on behalf of Mayer Brown with Mr. Goeke's authorization.

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2014, I caused the foregoing Motion to Withdraw As Counsel to be electronically filed with the Clerk of the Court using the CM/ECF system, which in turn will provide electronic notification of and access to such filing to the counsel of record in this matter who are registered on the CM/ECF system.

Dated: May 22, 2014

By: /s/ Patrick M. Brogan

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